

**From:** [Michael PINTO](#)  
**To:** [Bury, Carolyn](#)  
**Cc:** [Bob WRIGHT](#)  
**Subject:** East Plant Bi-Monthly Report  
**Date:** Friday, November 14, 2014 10:41:08 AM  
**Attachments:** [removed.txt](#)  
[September October 2014.pdf](#)

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Carolyn,

The September/October 2014 Bi-Monthly Progress Report for the Arkema East Plant is attached.

Michael Pinto  
RETIA USA LLC/Legacy Site Services LLC  
468 Thomas Jones Way, Suite 150  
Exton, PA 19341  
Office: 610 594-4435  
Fax: 610 594-4439



\*\*\*\*\* ATTACHMENT REMOVED \*\*\*\*\*

This message contained an attachment which the administrator has caused to be removed.

\*\*\*\*\* ATTACHMENT REMOVED \*\*\*\*\*

Attachment name: [image001.jpg]  
Attachment type: [image/jpeg]



November 14, 2014

*via electronic mail*

United States Environmental Protection Agency  
Region V  
RCRA Enforcement Branch (HRE-8J)  
77 Jackson Street  
Chicago, IL 60604  
Attention: Carolyn Bury, Project Coordinator

Subject: Administrative Order  
Docket No. V-W-89R-45  
Arkema Inc.  
Riverview, Michigan  
MID 005 363114  
Progress Report #148

Dear Ms. Bury:

In accordance with Task IV, Subtask B of Attachment IV to the above-referenced Administrative Consent Order (ACO), this letter will serve as the Bi-monthly Progress Report covering corrective action activities for the East Plant during the period of September and October 2014. A bi-monthly progress report for activities at the West Plant and West Brine Field will be submitted under separate cover by Mr. Bob Wright of Arkema Inc. (Arkema).

This report describes progress during the reporting period towards fulfilling the requirements of the ACO. A description of the activities anticipated for November and December 2014 is also included.

## **I. East Plant Activities Completed in September and October**

### **CMS Task IV**

The CMS is currently under review by USEPA.

### Interim Remedial Measures

Operation of the Halowax groundwater containment system continued. Since pumping began in 2001, 1,267,930 gallons of groundwater have been extracted and treated by the Halowax Area treatment system and approximately 495 gallons of DNAPL have been recovered and properly disposed. A total of 21,310 gallons of groundwater were extracted and treated during the reporting period.

### Other Activities

The third quarter Area 17 groundwater monitoring results were submitted to EPA.

LSS continues to cooperate with GLNPO and other non-federal parties to complete a design for a Great Lakes Legacy Act remediation project in the Trenton Channel.

## **II. Corrective Action Activities Anticipated for November and December 2014**

### CMS Task IV

LSS will await EPA approval and/or comments on the CMS.

### Interim Remedial Measures

Operation and maintenance of the Halowax groundwater containment system will continue.

### Other Activities

Fourth Quarter 2014 Area 17 groundwater monitoring will be performed.

Work will continue on the GLLA Trenton Channel project.

Based on the above information, LSS believes that all project activities during the reporting period were in full compliance with the requirements of ACO. If you have any questions or comments regarding this information, please call me at (610) 594-4435.

Sincerely,



Michael Pinto  
Principal Environmental Engineer  
Legacy Site Services, LLC

cc: Mr. Peter Quackenbush- MDNR - Waste Management Div. Lansing  
Mr. Laura Verona- MDNR - Waste Management Div. Livonia